THE EPISCOPAL DIOCESE OF MONTANA

POLICY FOR THE PROTECTION OF GOD'S PEOPLE

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Section 1– Protection of Adults

I. Theological and Ethical Foundations

"The Word became flesh and made his home among us. We have seen his glory, glory like that of a father's only son, full of grace and truth."

— John 1:14 (*Common English Bible*)

God expressed the fullness of humanity in Jesus of Nazareth, whom we worship as the Word made flesh. To be human is to live with God and the whole of creation in the fullness of freedom and the challenge of responsibility. The pattern of Jesus' life, death, and resurrection resonates unreservedly with God's call to perfect freedom and responsibility. In baptism, God, speaking through the Church, claims us in Christ. We become in Christ the community of God's final purpose: justice and peace, love and plenty for the whole creation. This new community lives in Eucharistic fellowship with God and Creation, as a sign and instrument of God's reconciling purpose in the world.

The Church is called to embody and advance God's mission. Ministry is the vocation of the whole community: laypersons, deacons, priests, and bishops who together represent Christ and the Church in the world.

The obligation to seek and serve Christ in all persons and to respect the dignity of every human being is binding for all the baptized. The authority with which *leaders* — ordained persons and adults who minister with *adults* — are entrusted, creates an inherent power imbalance in the *pastoral relationship*. This power imbalance derives from the leadership role and, in the case of clergy, the symbolic authority of an ordained person. Christian leadership is intended to provide occasions for guidance and grace, and its abuse is always and unequivocally wrong.

Ministry involves a necessary tension between a Gospel-based integrity and a Gospel-based intimacy as modeled by the life of Christ. A rigid adherence to a system of rules leads to an unproductive legalism. Yet, without the framework of the law, the intimate relationships into which Christ calls us risk distortion and harm. All the people of God are called to minister attentively within this tension. These policies are intended to provide a pattern for attentive practice of ministry.

This document is a statement for The Episcopal Church, setting forth expectations for its leaders in their relationships with all people. The purpose of this policy is to foster the highest standards of behavior in ministry settings.

II. Expectations and Local Implementation

This policy sets forth statements of general expectations and guidelines of behavior for ordained and lay people in the church when engaged in ministry with adults. This is the mandated policy for the

Episcopal Diocese of Montana, and it is strongly recommended for all such activities sponsored by every congregation, institution, organization, school, and agency of this diocese.

The purpose of these policies is to create safe and welcoming space for all adults and those engaged in ministry with adults, and to prevent sexual abuse.

Church governing bodies and all leaders should understand these policies and all local requirements thoroughly enough to make appropriate judgments and should consult with the Diocesan office when unanticipated situations arise.

No policy can foresee every circumstance to which it may be applied. Whenever applicable, questions of civil, criminal, and/or ecclesiastical discipline and employment offenses should be addressed with the relevant authorities immediately. Please contact the Diocesan Office for consultation and resources if assistance is needed.

III. Definitions

Adult: Anyone who is 18 years or older and not in high school.

Adult Protective Services: A social services program provided by state and local governments serving vulnerable adults and their families who need assistance. Adult Protective Services receive and investigate reports of suspected abuse, neglect, and exploitation.

Bisexual: A term describing a person capable of sustaining a primary sexual and affectional attraction for another person of either a female or male gender.

Bullying: Behavior that intimidates, humiliates, offends, degrades, or harms another person, whether verbal, psychological, social, physical, or otherwise.

Cisgender: An adjective describing a person whose gender identity corresponds with their sexual characteristics observed and gender assigned at birth. *This is an evolving term, as our understanding and language around gender identity and sexuality expands and matures.*

Clergy: (1) An ordained minister, priest, or rabbi; or, (2) a commissioned or licensed minister of a church or church denomination that ordains ministers if the person has the authority to perform substantially all the religious duties of the church or denomination; or, (3) a member of a religious order who has taken a vow of poverty; or, a (4) Christian Science practitioner.

Gender Identity: A term describing how a person more naturally and healthfully expresses their gender, regardless of their sexual characteristics observed and gender assigned at birth.

Gender Non-Binary: An umbrella term for people who identify their gender as neither male nor female. These people might identify as both ("bigender"), neither ("agender"), a mix between the two ("genderfluid"), or they can be unsure of their gender ("genderqueer"). This is an evolving term, as our understanding and language around gender identity and sexuality expands and matures.

Intake Officer: The person(s) designated by each diocese to receive information regarding an offense for which a member of the clergy may be held accountable under Title IV of the Constitution and Canons of The Episcopal Church, which sets out the disciplinary process for clergy. Anyone may contact an Intake Officer to report concerns.
If you need to contact the diocesan Intake Officer, call 406-442-4175, for a confidential reporting line.

Intersex: A term describing a person whose sexual chromosomes may not match with the gender appearance at birth. Physical characteristics may be a mix of both genders.

Leader: A person who, for the benefit of another, engages in ministry without responsibility for oversight of other adults engaged in that same ministry. Examples include Eucharistic Visitors and members of pastoral care teams.

LGBTIQ+: An acronym for Lesbian, Gay, Bisexual, Transgender, Intersex, Queer, and others. This term provides a shorthand reference for a complex set of sexual and gender identities, and their related communities. "LGBTIQ+" is not in itself an identity, nor a singular community. An even more complete listing of these identities and communities would further include: Questioning, Asexual, Two Spirit (2S), and more. The "+" is commonly added to this term in an effort to respectfully include these additional, and other, further sexual and gender identities.

Mandated Reporter: A person who is required by state law to report reasonable suspicions of abuse, neglect, and/or exploitation of vulnerable populations to the appropriate state agency. State laws vary greatly. Generally, state law mandates that either all adults or adults in certain professions report suspected abuse of children and/or youth. It is imperative to know the requirements of applicable state laws. Typically, individuals who are not mandated to report suspicion of abuse may make a report to the appropriate state agency, even though not legally required to do so.

In Montana, as of the beginning of the 2021 Legislative Session, the following professions/professionals are listed as mandated reporters (see Mont. Code Ann. § 41-3-201):

1. Physicians, residents, interns, members of hospital staffs, nurses, osteopaths, chiropractors, podiatrists, medical examiners, coroners, dentists, optometrists, or any other health professionals
2. Teachers, school officials, or school employees who work during regular school hours.
3. Operators or employees of any registered or licensed daycare or substitute care facility, or operators or employees of childcare facilities
4. Mental health professionals or social workers

5. Religious healers
6. Foster care, residential, or institutional workers
7. Members of the clergy, as defined in § 15-6-201(2)(b)
8. Guardians' ad litem or court-appointed advocates authorized to investigate a report.
9. Peace officers or other law enforcement officials.

Off-Site: Any location other than the sponsoring Episcopal church or institutional facility or campus.

Organizations: All institutions for which the diocese or congregations have legal or fiduciary responsibility (examples: diocesan departments, commissions, conference & retreat centers, adult day care centers, retirement communities, religious orders, congregations, schools, etc.).

Overnight: Any event that starts on one calendar day and ends on a different calendar day.

Pastoral Relationship: Any relationship (1) between a Member of the Clergy and any person to whom the Member of the Clergy provides or has provided counseling, pastoral care, spiritual direction, or spiritual guidance, or from whom such Member of the Clergy has received information within the Rite of Reconciliation of a Penitent, or (2) between a lay minister and any person to whom the lay minister is offering prayer, ministry, and/or any person from whom the lay minister has received sensitive, personal, or confidential information in the course of offering ministry.

Programs: Official activities and programs sponsored by the Episcopal Church and its provinces, dioceses, and congregations.

Public Record Check: A search of documents and data available to the public including criminal and civil court records, credit reports, and driving records from the department of motor vehicles. Typically, such searches are conducted by a third party with expertise in this area.

Queer: An old and controversial epithet, which means "perverse" or "odd," that has also been modernly self-chosen by some as a positive identity or adjective. It's use remains controversial, particularly among homosexual men, and may be considered offensive to some people.

Residential Facility: Any institutional or group home setting where a vulnerable adult resides on a permanent or temporary basis such as a nursing home, rehabilitation center, assisted living facility, treatment center, or memory care facility.

Responsible Person: The person designated as being accountable for compliance with this policy for an event or program.

Sacramental Use: Consecrated or unconsecrated wine used in the setting of Eucharist.

Supervisor: A person who has oversight responsibilities for a ministry program and/or leaders in a ministry program.

Sexual Orientation: A term describing a person's primary sexual and affectional attraction, on a spectrum ranging from exclusively homosexual to exclusively heterosexual.

Title IV: A section of the Constitution and Canons of The Episcopal Church pertaining to clergy professional standards, accountability, and ecclesiastical discipline.

Transgender: An adjective describing a person whose deeply felt sense of gender does not correspond with the gender assigned to them at birth. *This is an evolving term, as our understanding and language around gender identity and sexuality expands and matures.*

Training: Organized activity designed to provide information and/or instructions to strengthen and enhance the recipient's understanding, capacity, and exercise of ministry.

Universal Training: A standard of training that will foster a culture of safety and inclusion for all people that includes a broad overview of issues of vulnerability, power, and healthy boundaries. This training is designed to equip all people to live out their Baptismal Covenant.

Specialized Training: A standard of additional training that equips people who participate in or have oversight responsibility for ministries. In addition to Universal Training, a person will have access to training that is specialized and tailored to their role and ministry function.

Vulnerable Adult:

1. Any adult at or older than the age designated as an elder by applicable state law.
2. Any adult who is infirm or diminished in capacity due to age, illness, or disability.
3. Any adult who is ministered to in their home (by Eucharistic Visitors, Pastoral Care Visitors, Stephen Ministers, or others).
4. Any adult who is wholly or partially dependent upon one or more other persons for emotional, psychological, or physical care or support, such dependency may be temporary as in the case of an accident, illness, or birth of a child; and
5. Any adult who by virtue of a crisis, experiences vulnerability leading to dependency on another or lacks agency in a pastoral relationship as in the wake of death of a family member or job loss.

IV. Application and Screening

Dioceses, congregations, and other organizations are required to screen all persons according to the standards in the *Safe Church Training Requirements and Recommendations* (Appendix A). For some positions, screening consists only of a Public Records Check. For other positions there are additional screening requirements of a written application, interview, and reference verification.

A. Public Records Checks

1. Congregations and other organizations shall contact the diocese who will conduct public records checks on behalf of the sponsoring congregation or entity of the diocese.
2. Such checks must be completed before the employee begins programmatic interaction with adults as agents of the church.
3. Public records checks shall include all available criminal records and sex offender registries.
4. A Department of Motor Vehicles (DMV) records check is needed if transporting vulnerable adults as part of, or an extension of, ministry of the church or for a church-sponsored event.
5. Public records checks must be updated at least every four years while engaged in continuous ministry.

B. Additional Screening Requirements

Written application, interview, and reference verification are required before serving in certain roles and ministries as specified in the *Safe Church Training Requirements and Recommendations* (Appendix A). Where required, these components are generally conducted in the following order:

1. Submission of a completed written application to serve in a specified role with a clearly defined, written "job description." The application includes verifiable personal information.
2. Personal interview.
3. Reference verification conducted by congregations and other organizations to verify personal information and check references listed in the application (people who know but are not related to the applicant); and
4. Maintenance of these records as described below.

Potential leaders or supervisors must be known and active in the congregation for at least six months before engaging in ministry with adults unless they are required to have public records checks and reference checks pursuant to the *Safe Church Training Requirements and Recommendations* (Appendix A). Dioceses, congregations, and other organizations must keep and maintain all application and screening records secure and confidential in the diocese, church, or organization's office. This includes a signature by each applicant verifying receipt of a copy of this policy, including any local procedures or variations.

V. Education and Training

Training shall be appropriate to each person's function according to the *Safe Church Training Requirements and Recommendations.*

All Leaders shall have Universal Training that fosters a culture of safety and inclusion for all people and covers a broad overview of issues of vulnerability, power, and healthy boundaries. Universal Training is designed to equip all people to live out their Baptismal Covenant. All members of the Episcopal Church shall have access to this training.

In addition to Universal Training, all Supervisors and those with oversight responsibilities for ministry programs and/or other adults who engage in ministry with vulnerable adults and minors (see Section 2 of this Policy) shall have Specialized Training that is tailored to their role and ministry function.

Depending on role and responsibility, Specialized Training may include Title IV and Anti-Racism Training.

To access all online Safe Church trainings, please follow these steps:

1. Email **safeguarding@diomontana.com** with the (1) your name (2) your parish, (3) your ministry (i.e. "youth worker", "vestry", etc.), (4) your email, and (5) your phone number.
2. You will receive a response with information and an invitation to create a Praesidium account,
3. Log in to Praesidium and complete the modules.
4. Finally, it is essential that you save a copy of course completion certificates, sending a copy to your parish's rector, vestry, and/or parish administrator.

This policy is reviewed the first quarter of every year and is subject to updates and changes. This review will be performed at the discretion of the Bishop, and with the assistance of the Diocesan Council. The Commission on Ministry will review this policy, offering their suggestions to the Bishop, in the first quarter of even numbered years. It is prudent to have revisions complete by June to allow all ministers enough time to complete their certifications before the program year.

Classes are currently being created concerning:

1. An introduction to gender non-binary.
2. The needs of aging LGBTIQ+ individuals who often struggle to find care or residential facilities adequately equipped to meet their needs; and
3. The ways that vulnerable adults can engage in self-advocacy.

Certification of training shall be renewed every four years.

Dioceses, congregations, and other organizations with responsibility for programs with, or services or ministries to, all vulnerable persons shall keep records sufficient to evidence compliance with this policy.

VI. Monitoring and Supervision of Programs

All people who minister to vulnerable adults and/or have pastoral relationships with other vulnerable persons must have ongoing supervision. Ongoing supervision should consist of regular check-ins by the Supervisor who may be parish clergy or a team leader. Such supervision shall review the scope, accountability, and responsibly of the ministry with the person engaged in the ministry. Each person engaged in such ministry should know who supervises their ministry and how to contact them.

Dioceses, congregations, and organizations shall ensure that all people who minister to vulnerable populations receive prior training as to the scope, accountability, and responsibility of the ministry.

Dioceses, congregations, and organizations shall maintain an up-to-date list of persons with their contact information approved to minister to vulnerable adults and/or engage in pastoral relationships with other vulnerable persons. This list shall be kept in the organization's office or other place where records are kept.

It is best practice for those ministering to vulnerable persons to document their visits, including time, place, and any observations or concerns. Such documentation is reviewed by the Supervisor.

Confidentiality among clergy and lay ministers is required and all documentation is kept confidential. This documentation promotes continuity of care and transparency in ministry.

All new activities that include pastoral relationships and/or ministry to vulnerable adults shall have a Responsible Person to monitor and supervise all events to ensure appropriate behavior and healthy boundaries.

A. Presence of Unrelated Adults Suggested

It is best practice for those ministering to vulnerable adults, or in the homes of others, to do so with another trained adult minister present. Those engaged in such ministries should minister in pairs.

If a diocese, congregation, or organization's policy requires that there be two unrelated adults present, and if circumstances result in a minister being alone with a vulnerable adult, that minister shall report this to the Supervisor, clergy, senior warden, or Responsible Person as soon as possible.

B. Creating Safe Space for Pastoral Relationships and/or Ministry with Adults.

To create a safe space, it is necessary to anticipate and avoid circumstances that could result in exposure of adults to undue influence or exploitation. On-site and off-site settings for ministry with vulnerable adults and pastoral relationships and conversations should:

1. Be in places where casual monitoring by others is convenient; and
2. Convey safety and comfort.

C. Inclusiveness

No one shall be denied rights, status, or access to an equal place in the life, worship, and governance of any program or activity because of race, color, ethnic origin, national origin, marital status, sex, sexual orientation, gender identity and expression, differing abilities, socio-economic class, or age. To the extent possible, all spaces and settings for programs, activities and ministry shall be accessible. The Episcopal Church seeks to support all persons by providing reasonable alternative arrangements regardless of state law to address safety and comfort.

Transgender, or gender non-binary adults who express the need or desire for increased privacy should be provided with reasonable alternative arrangements. Reasonable alternative arrangements may include the use of a private area, or a separate changing schedule, or use of a single-stall restroom. Any alternative arrangement should be provided in a way that protects the adult's ability to keep their transgender status confidential, if they so desire.

Transgender, or gender non-binary adults should not be required to use a locker room or restroom that conflicts with their gender identity. Safe bathroom/shower facilities will be provided by gender (or specific times will be assigned for the use of a single facility).

D. Violence

- No one is to strike, hit, or otherwise physically threaten or harm anyone at any time.
- No one is to control or attempt to control another by bullying, intimidation, threats, verbal/emotional abuse, or isolation from others. Bullying of any kind by anyone is prohibited.
- Report suspected violations immediately. See Suspected Violations of this Policy in Section 1.VII.B.

E. Behavioral Standards for Ministry with Adults

All who work with adults are expected to model the patterns of healthy relationships. To this end, lay, and ordained ministers working with adults shall:

1. Take care not to unduly influence a person to whom they minister.
2. Accept only token gifts from those to whom they minister. Ministers given gifts shall report those gifts in writing to their Supervisor, clergy, senior warden, or Responsible Person.
3. Decline to accept loans of any kind from those to whom they minister.
4. Decline to agree to be named as a beneficiary or to act as an administrator or executor in a will of anyone to whom they minister; and
5. Inform Supervisor, clergy, senior warden, or Responsible Person of anything that causes concern for the safety or wellbeing of those to whom they minister.

DO - All who minister to adults are encouraged to:

1. Have ongoing spiritual practices, which might include daily prayer, regular participation in corporate worship, and Bible study.
2. Spend time with and listen to adults, and advocate for their ministry within the Body of Christ.

3. Offer appropriate physical expressions of affection, if they are welcomed by the recipient. These may include:
    a. brief hugs.
    b. pats on the shoulder or back.
    c. handshakes.
    d. holding hands during prayer; and
4. Maintain healthy boundaries when sharing personal information.

DON'Ts - Adults shall not under any circumstances:

1. Provide vulnerable persons with non-sacramental alcohol, marijuana, illegal drugs, cigarettes, e-cigarettes, vapes, or pornography.
2. Arrive under the influence of alcohol, illegal drugs, or misuse of legal drugs when they are responsible for, or ministering to, an adult.
3. Consume non-sacramental alcohol or illegal drugs or misuse legal drugs when they are responsible for, or ministering to, an adult.
4. Engage in illegal behavior or permit others to engage in illegal behavior; or
5. Engage in any sexual, romantic, illicit, or secretive relationship or conduct with any adult.

F. Visits to Private Residences

The safety of all persons and healthy boundaries are essential when visiting an adult in a private home. Avoid situations that might compromise privacy; common examples include:

1. Visiting behind closed bedroom doors.
2. Sitting on the bed of the person being visited; or
3. Visiting a person while they are not fully clothed.

The best practice is to visit in teams of two or more. If it is not possible for another adult minister to be present, a member of the adult's household should be present. If neither is possible, documentation of the time, duration of visit, general matters discussed, and any pastoral concerns shall be provided to the Supervisor as soon as possible after the visit.

G. Visits to Residential Facilities

The safety of all persons and healthy boundaries are also essential when visiting an adult in a Residential Facility. Best practices include:

1. Facility staff should be informed of the visitor's presence.
2. If a visit takes place out of sight of staff, they should be notified in advance and informed when such meeting is concluded.
3. The door to a resident's private room must remain open during visits.
4. Visitors should be mindful that LGBTQ+ residents may not be safe to express their sexual identity or orientation, as staff members may not yet have been trained; and
5. In the event of uncertainty about application of this policy, the visitor is encouraged to contact their supervisor with the relevant queries.

H. Off-Site Visits, Events, and Programs

Off-site programs, trips, and events are a welcome and often necessary means for spiritual, social, and emotional wellbeing of adults. They also present additional challenges for maintaining best practices for safe and healthy ministry. The expectations for safe space, as described above, should be observed off-site.

In the event of uncertainty about application of this policy, the Responsible Person should contact their supervisor with the relevant queries. Because of the unique risks that can't always be anticipated, it is important to obtain permissions and manage documentation as described below.

1. Prior Approvals

1. Prior approval by the governing body and the member of the clergy in charge is required, and that approval shall be reflected in the minutes of the governing body. Diocesan sponsored programs, trips, or events shall receive prior diocesan approval.
2. These same prior approvals are required when the site is a private residence, hosting such events as cook outs, progressive dinners, etc.

In the event of uncertainty, the Responsible Person should contact the Diocesan office with the relevant information.

2. Registration, Waivers, and Release Forms

Due to the unique risks of off-site visits, events, and programs that cannot always be anticipated, it is important to obtain permissions and manage documentation as described below:

All participants shall complete and sign a registration, waiver, and release before participating in any program. Confidentiality must be preserved with respect to medical information.

1. There must be a signature on all release and waiver forms. If a person is unable to consent due to impairment or lack of agency, then the signature of that person's guardian, spouse, or other trusted family member is required. Digital/electronic signatures are acceptable in the State of Montana.
2. Completed release and waiver forms shall be maintained in a secure location on-site. Check with the Diocesan office regarding whether such forms may be saved electronically and how long they must be retained.

Permission slips shall be provided for each event and shall be signed by the vulnerable adult, guardian, spouse, or other trusted family member.

Prior permission for an individual to be photographed or recorded on film, videotape, audiotape, or other electronic media is required.

3. First Aid and Medications

Current certification in First Aid, CPR, and Automated External Defibrillator (AED) is strongly encouraged for those who work with vulnerable persons.

1. A first aid kit, appropriately stocked for the event and participants, shall be available in an easily accessible location.
2. If a vulnerable adult requires assistance with medications of any type, then a record must be kept for all medication, or first aid given to a participant. This record shall include the participant's name, the date and time of service, the name of the person administering medication or treatment, and a description of the medication, dosage and/or treatment given.
3. All medications (prescription and over the counter) belonging to vulnerable adults requiring assistance with medications shall be given to the Responsible Person, unless otherwise agreed upon.
4. Only the Responsible Person, or their adult designee, shall administer medications.

I. Transportation

For the health and safety of all participants, the following practices shall be followed:

1. For events that originate and/or terminate at the diocesan, congregation, or organization's facility, all drivers authorized to transport vulnerable adults on behalf of the sponsoring organization:
    a. must be at least 21 years of age and provide proof of insurance and a current driver's license,
    b. a completed volunteer driver information form, and
    c. have an approved DMV records check.
2. A list of those approved to provide transportation to vulnerable adults shall be maintained in the office of the organization.
3. Anyone being transported must consent to such transportation beforehand. If a person is unable to consent due to impairment or lack of agency, then prior approval by that person's guardian, spouse, or other trusted family member is required; and
4. All drivers and riders must comply with state laws including seat belt and cell phone usage.

J. Insurance for Overseas Pilgrimages and Mission Trips

1. Short-term trip or supplemental insurance, available through most church and organization's policies as an added rider, must be secured at-least one month prior to travel.
2. It is recommended that all travelers carry evidence of personal health insurance by virtue of a copy of the actual card provided to the insured person.
3. Because not all individuals have access to affordable and adequate health insurance, it is recommended that health insurance be added to trip insurance.

K. International Considerations

1. Check in with the U.S. Department of State on travel requirements, including visas.
2. Make certain that every traveler's passport is valid for at least six months beyond your return date.
3. Determine whether vaccinations are required and/or recommended for entry into specific countries.

4. Arrange to have at least two cell phones with the group that will have active coverage in your destination(s). Make a back-up plan for communication with your Responsible Person at home.

L. Conference and Retreat Centers
All conference and retreat centers of the diocese, congregations, and organizations shall follow the guidelines for Off-Site Programming established in this policy.

VII. Responding to Concerns

A. Suspected Abuse, Neglect, or Exploitation of a Vulnerable Adult
Anyone who has reason to suspect that abuse, neglect, or exploitation of a vulnerable adult has taken place, is required, and all mandated reporters are required to contact the state's Adult Protective Services.

Montana Statewide Reporting
https://dphhs.mt.gov/sltc/aps
1-844-277-9300
Monday- Friday 8:00 am - 5:00 pm

Episcopal Diocese of Montana Intake Officer
406-442-4175
If no answer, leave a message.
All calls are confidential.

In addition, anyone who has reason to suspect that abuse, neglect, or exploitation of a vulnerable adult has taken place within a facility or program of the diocese, congregation, or other organization, should immediately inform one of more or the following:

1. The bishop or the bishop's office in the case of a diocese.
2. Member of the clergy in charge or the senior warden in the case of a congregation.
3. The director, head, or other governing officer in the case of other organizations; and/or
4. The Intake Officer (406-442-4175) in case a member of the clergy is suspected of abuse, neglect, and/or exploitation.

B. Suspected Violations of this Policy
Anyone who suspects a violation of these policies shall immediately report the violation to the Responsible Person, member of the clergy in charge, and senior warden.

Clergy in charge receiving reports of violations of this policy shall be responsible for providing appropriate pastoral care to all those affected and appropriate remedial and/or disciplinary action up to and including termination of employment or unpaid ministry with the church. If the Responsible Person is a lay person, they are responsible to ensure that appropriate pastoral care is provided for all.

Anyone who knows of a violation of these policies by a member of the clergy shall immediately report the violation to the bishop's office and/or the Intake Officer. Anyone can make a report to an Intake Officer.

The bishop, hearing reports of violations by clergy, or by laity at diocesan events, shall be responsible for providing appropriate pastoral care to all those affected and appropriate remedial and/ or disciplinary action, up to and including canonical disciplinary action, as provided by Title IV of the Constitutions and Canons and/or termination of employment or unpaid ministry with the diocese.

C. Local Resources for Response

Each diocese, congregation, or organization shall provide a list of local resources that can give information and assistance to anyone concerned about circumstances that may violate this policy. Such resources with contact information shall include:

1. Responsible Person(s) for programs and ministries with vulnerable adults
2. Clergy in charge of a congregation
3. Wardens
4. Bishop
5. Intake Officer(s); and
6. Adult Protective Services.

VIII. Policy Adoption, Implementation, and Audit

A. The Episcopal Church Adoption and Implementation

The Episcopal Church shall ensure that all programs and events of the Episcopal Church involving vulnerable persons comply with the standards set out in this policy.

B. Diocesan Adoption, Implementation, and Audit

This policy was adopted by the Episcopal Diocese of Montana through the Commission on Ministry on February 18, 2025, and the Diocesan Council on February 22, 2025.

The bishop or ecclesiastical authority shall inform congregations and other organizations within the diocese of the contents of this policy with the requirement that each congregation or organization adopt a policy in accordance with this policy.

This policy should be reviewed before June in even-numbered years, by the Commission on Ministry to ensure that it is up to date and adequately reflects the best interests of the people of the Diocese and the safety of all of God's children. In cases of extensive revision, a special task force may be called by the bishop or ecclesiastical authority.

Procedures to be confirmed by audit will include (but are not limited to):

1. Verification that each congregation and/or organization (including Camp Marshall) within the diocese has adopted a policy that is consistent with and/or exceeds the diocesan policy; and
2. Provision of accessible and appropriate training for all those who work with vulnerable people in accordance with *Safe Church Training Requirements and Recommendations* (Appendix A). Such training shall include, at a minimum, topics identified in this policy.

3. Verification that each congregation and/or organization (including Camp Marshall) has a process to ensure members access training and conduct public record checks when necessary; and
4. Review of this policy with possible suggestions for modifications to the Commission on Ministry.

C. Congregation and Organization Adoption, Implementation, and Audit
Congregations and organizations must adopt a **Policy for the Protection of God's People** that is consistent with and/or exceeds the requirements in this policy.

Congregations and organizations may adopt site-specific variations from diocesan policies, where permitted by vestries or governing bodies, which shall be described in detail, including the circumstances under which those variations are to be permitted and their rationale. This approval shall be recorded in the minutes of the vestry or governing body.

The **Policy for the Protection of God's People** shall be posted in an area where activities take place, and shall be given to all adults, guardians, and all paid and unpaid persons who minister to vulnerable persons. These policies shall include the names and phone numbers of the member of the clergy in charge, the senior warden, and a contact person in the bishop's office.

Each congregation or organization is required to conduct a **Safe Church Self-Audit** annually to confirm compliance with diocesan safe church policies. This Self-Audit will be overseen by the Rector and Vestry and reported to the Diocesan office. Individual congregations/organizations may contact the Diocese at safeguarding@diomontana.com to verify ministers' status.

Procedures to be confirmed by audit will include (but are not limited to):

1. Public records checks, application forms, records of screening, and reference verification of paid and unpaid persons engaged in ministry with adults as agents of the church.
2. Records of compliance with ***Safe Church Training Requirements and Recommendations*** (Appendix A);
3. Procedures for responding to concerns and incidents; and
4. Evidence of compliance with "safe space" requirements.

Section 2– Protection of Children or Youth

I. Theological and Ethical Foundations

"The Word became flesh and made his home among us. We have seen his glory, glory like that of a father's only son, full of grace and truth."

— John 1:14 (*Common English Bible*)

God expressed the fullness of humanity in Jesus of Nazareth, whom we worship as the Word made flesh. To be human is to live with God and the whole of creation in the fullness of freedom and the challenge of responsibility. The pattern of Jesus' life, death, and resurrection resonates unreservedly with God's call to perfect freedom and responsibility.

In baptism, God, speaking through the Church, claims us in Christ. We become, in Christ, the community of God's final purpose: justice and peace, love and plenty for the whole creation. This new community lives in Eucharistic fellowship with God and Creation, as a sign and instrument of God's reconciling purpose in the world.

The Church is called to embody and advance God's mission. Ministry is the vocation of the whole community: laypersons, deacons, priests, and bishops who together represent Christ and the Church in the world.

The obligation to seek and serve Christ in all persons and to respect the dignity of every human being is binding for all the baptized. The authority with which **leaders** — ordained persons and adults who minister with minors (**children** and **youth**), and youth in leadership roles — are entrusted, creates an inherent power imbalance in the **pastoral relationship**. This power imbalance derives from the leadership role and, in the case of clergy, the symbolic authority of an ordained person. Christian leadership is intended to provide occasions for guidance and grace, and its abuse is always and unequivocally wrong.

Ministry involves a necessary tension between a Gospel-based integrity and a Gospel- based intimacy as modeled by the life of Christ. A rigid adherence to a system of rules leads to an unproductive legalism. Yet, without the framework of the law, the intimate relationships into which Christ calls us risk distortion and harm. All the people of God are called to minister attentively within this tension. These policies are intended to provide a pattern for attentive practice of ministry.

This document is a statement for the Episcopal Church, setting forth expectations for its leaders in their relationships with children and youth. The purpose of these policies is to foster the highest standards of behavior in ministry settings.

The document includes:

- ***Safe Church Training Requirements and Recommendations*** (Appendix A), training required before engaging in ministry with children and youth;
- A description of requisite training that is specialized and tailored to ministry role and function;
- Behavioral standards designed to ensure that children and youth and all who engage in ministry with them are treated with dignity and respect in all settings; and

- ***Recommended Practices and Guidelines for Social Media and Electronic Communications*** (Appendix B).

II. Expectations and Local Implementation

This policy sets forth statements of general expectations and guidelines of behavior for ordained and lay people in the church when engaged in ministry with children and youth. This is the mandated policy for the Episcopal Diocese of Montana and is strongly recommended for all such activities sponsored by every congregation, institution, organization, school, and agency of this diocese. The purpose of these policies is to create safe and welcoming space for all children and youth in our communities and those engaged in ministry with children and youth and to prevent sexual abuse.

Church governing bodies and all leaders should understand these policies and all local requirements thoroughly enough to make appropriate judgments and should consult with the Office of the Bishop when unanticipated situations arise.

No policy can foresee every circumstance to which it may be applied. Whenever applicable, questions of civil, criminal, and/or ecclesiastical discipline and employment offenses should be addressed with the relevant authorities immediately. Please contact the Office of the Bishop for consultation and resources if assistance is needed.

III. Definitions

NOTE: These definitions reflect our understanding of terms describing gender identity and sexuality, which are evolving as these policies are being written.

Adult: Anyone who is 18 years or older and not in high school (see definition for "youth" on page 21).

Bullying: Behavior that intimidates, humiliates, offends, degrades, or harms another person, whether verbal, psychological, social, physical, or otherwise.

(Camp) Counselor: Youth employee or volunteer who holds a supervisory role. Counselors must be at least two years older than participants.

Child: Anyone under the age of 12 years (see definition for "youth" on page 21).

Child Protective Services: A social services program provided by state and local governments serving children and their families who need assistance. Child Protective Services receive and investigate reports of suspected abuse, neglect, and exploitation.

Cisgender: An adjective describing a person whose sense of personal identity and gender corresponds with their gender or sex assigned at birth. This is an evolving term, as our understanding and language around gender identity and sexuality expands and matures.

Gender Non-Binary: An umbrella term for people who identify their gender as neither male nor female. These people might identify as both ("bigender"), neither ("agender"), a mix between the two ("genderfluid"), or they can be unsure of their gender ("genderqueer"). This is an evolving term, as our understanding and language around gender identity and sexuality expands and matures.

Intake Officer: The person(s) designated by each diocese to receive information regarding an offense for which a member of the clergy may be held accountable under Title IV of the Constitution and Canons of The Episcopal Church, which sets out the disciplinary process for clergy. Anyone may contact an Intake Officer at 406-442-4175 to report concerns.

Leader: A person, adult, or youth, who, for the benefit of another, engages in ministry without responsibility for oversight of others engaged in that same ministry. Examples include Sunday school teachers, camp counselors, and program team.

LGBTQ+: An acronym for Lesbian, Gay, Bisexual, Transgender, Queer/Questioning, and others. It refers to people whose gender identities vary from their gender or sex assigned at birth, or whose sexual orientations differ from the heterosexual majority. The "+" is an effort to include additional gender identities. This is an evolving term, as our understanding and language around gender identity and sexuality expands and matures.

Mandated Reporter: A person who is required by state law to report reasonable suspicions of abuse, neglect, and/or exploitation of vulnerable populations to the appropriate state agency. State laws vary greatly. State law mandates that either all adults or adults in certain professions report suspected abuse of children and/or youth. It is imperative to know the requirements of applicable state laws. Typically, individuals who are not mandated to report suspicion of abuse may make a report to the appropriate state agency, even though not legally required to do so.

In Montana, as of the beginning of the 2021 Legislative Session, the following professions/professionals are listed as mandated reporters (see Ann. Code § 41-3-201):

- Physicians, residents, interns, members of hospital staffs, nurses, osteopaths, chiropractors, podiatrists, medical examiners, coroners, dentists, optometrists, or any other health professionals
- Teachers, school officials, or school employees who work during regular school hours.
- Operators or employees of any registered or licensed daycare or substitute care facility, or operators or employees of childcare facilities
- Mental health professionals or social workers
- Religious healers
- Foster care, residential, or institutional workers
- Members of the clergy, as defined in § 15-6-201(2)(b)
- Guardians' ad litem or court-appointed advocates authorized to investigate a report.
- Peace officers or other law enforcement officials.

The term 'clergy' means:

- An ordained minister, priest, or rabbi.
- A commissioned or licensed minister of a church or church denomination that ordains ministers if the person has the authority to perform substantially all the religious duties of the church or denomination.
- A member of a religious order who has taken a vow of poverty.
- A Christian Science practitioner.

Off-Site: Any location other than the sponsoring Episcopal Church, institution, facility, or campus.

Organizations: All institutions for which the diocese or congregations have legal or fiduciary responsibility (examples: diocesan departments, commissions, conference & retreat centers, adult day care centers, retirement communities, religious orders, congregations, schools, etc.).

Overnight: Any event that starts on one calendar day and ends on a different calendar day.

Pastoral Relationship: Any relationship (1) between a Member of the Clergy and any person to whom the Member of the Clergy provides or has provided counseling, pastoral care, spiritual direction or spiritual guidance, or from whom such Member of the Clergy has received information within the Rite of Reconciliation of a Penitent, or (2) between a lay minister and any person to whom the lay minister is offering prayer, ministry, and/or any person from whom the lay minister has received sensitive, personal, or confidential information in the course of offering ministry.

Programs: Official activities and programs sponsored by The Episcopal Church and its provinces, dioceses, and congregations (examples include: The Episcopal Youth Event, Provincial Youth Events, Happening, Teens Encounter Christ, pilgrimages, mission experiences, New Beginnings, camp programs, Acolyte Festival, etc.).

Public Records Check: A search of documents and data available to the public including criminal and civil court records, credit reports, and driving records from the department of motor vehicles. Typically, such searches are conduct by a third party with expertise in this area.

Responsible Person: The person designated as being accountable for compliance with this policy for an event or program.

Sacramental Use: Consecrated or unconsecrated wine used in the setting of Eucharist.

Sexual misconduct: A broad term encompassing any behavior of a sexual nature that is committed without consent or capacity for consent or by force, intimidation, coercion, or manipulation. Sexual misconduct can be committed by a person of any gender, and it can occur between people of the same or different gender.

Supervisor: A person who has oversight responsibilities for a ministry program and/or Leaders in a ministry program.

Title IV: A section of the Constitution and Canons of The Episcopal Church pertaining to clergy professional standards, accountability, and ecclesiastical discipline.

Transgender: An adjective describing a person whose sense of personal identity and gender does not correspond with the gender or sex assigned to them at birth. This is an evolving term, as our understanding and language around gender identity and sexuality expands and matures.

Training: Organized activity designed to provide information and/or instructions to strengthen and enhance the recipient's understanding, capacity, and exercise of ministry.

- **Universal Training**: A standard of training that will foster a culture of safety and inclusion for all people that includes a broad overview of issues of vulnerability, power, and healthy boundaries. This training is designed to equip all people to live out their Baptismal Covenant.

- **Specialized Training**: A standard of additional training that equips people who participate in or have oversight responsibility for ministries. In addition to Universal Training, a person will have access to training that is specialized and tailored to their role and ministry function.

Youth: Anyone who is at least 12 years old, but not yet 18 years old. A youth may also be an individual who is 18 years old or older, and still in high school or enrolled in equivalent GED program.

IV. Application and Screening

Dioceses, congregations, and other organizations are required to screen all persons according to the standards in the *Safe Church Training Requirements and Recommendations* (Appendix A). For some positions, screening consists only of a Public Records Check. For other positions there are additional screening requirements of a written application, interview, and reference verification.

A. Public Records Checks

- Congregations and other organizations shall contact the diocese who will conduct public records checks. Such checks must be completed before the employee or volunteer begins interacting with children and youth.
- Criminal public records checks shall include all available criminal records and sex offender registries.
- A Department of Motor Vehicles (DMV) records check is needed if transporting children and youth as part of, or an extension of, ministry of the church or for a church-sponsored event.
- A credit check is required with check signing authority; and
- Public records checks must be updated at least every four years.

B. Additional Screening Requirements

Written application, interview, and reference verification are required before serving in certain roles and ministries as specified in the *Safe Church Training Requirements and Recommendations* (Appendix A). Where required, these components are conducted in the following order:

- Submission of a completed written application to serve in a specified role with a clearly defined, written "job description." The application includes verifiable personal information.
- Personal interview.
- Reference verification conducted by congregations and other organizations to verify personal information and check references listed in the application (people who know but are not related to the applicant); and
- Maintenance of these records as described below.

Potential Leaders or Supervisors must be known and active in the congregation for at least six months before engaging in ministry with children and youth, unless they are required to have public records checks and reference checks pursuant to the *Safe Church Training Requirements and Recommendations* (Appendix A).

Dioceses, congregations, and other organizations must keep and maintain all application and screening records secure and confidential in the diocese, congregation's, or organization's office. This includes a signature by each applicant verifying receipt of a copy of this policy, including any local procedures or variations.

V. Education and Training

Training shall be appropriate to each person's function according to the *Safe Church Training Requirements and Recommendations* (Appendix A).

All Leaders shall have Universal Training that fosters a culture of safety and inclusion for all people and covers a broad overview of issues of vulnerability, power, and healthy boundaries. Universal Training is designed to equip all people to live out their Baptismal Covenant. All members of the Episcopal Church shall have access to this training.

In addition to Universal Training, all Supervisors and those with oversight responsibilities for ministry programs and/or other adults who engage in ministry with children and youth shall have Specialized Training that is tailored to their role and ministry function.

Safe Church trainings take place both in person and online. Introductory and universal trainings are often most effective when taught in a classroom setting with dialogue, while online training is especially beneficial for renewals and more specialty training opportunities. There are benefits to both, and one should choose the arena in which they learn best. In order to facilitate more in-person trainings it is an expectation that each deanery of the Diocese of Montana will have at least one trained trainer who can lead local and regional trainings.

Those in attendance and the subject matter taught in the training, *must be* recorded, and reported, to the Safe Church office (safeguarding@diomontana.com).

Additionally, it is recommended that parish-based clergy offer annual discussions about these policies. This will increase awareness and help to communicate that the point of these policies is to provide a safe environment for all of God's children, not simply an insurance requirement.

To access all online Safe Church trainings, please follow these steps:

1. Email **safeguarding@diomontana.com** with the (1) minister's name, (2) phone number, (3) email address, (4) ministry (ie. "youth worker", "vestry", etc.), (5) parish.
2. You will receive a response with information and an invitation to create a Praesidium account,
3. Log in to Praesidium and complete the modules.
4. Finally, it is essential that you save a copy of course completion certificates, sending a copy to your parish's rector, vestry, and/or parish administrator.

The current list of requirements for each ministry is available in Appendix A of this document. Additional Training you may need includes **Title IV** and **Anti-Racism Training.**

This policy is reviewed the first quarter of every year and is subject to updates and changes. This review will be performed at the discretion of the Bishop, and with the assistance of the Diocesan Council. The Commission on Ministry will review this policy, offering their suggestions to the Bishop, in the first quarter of even numbered years. It is prudent to have revisions complete by June to allow all ministers enough time to complete their certifications before the program year.

Examples of classes that are currently being developed include.

- An introduction to gender non-binary.

- The needs of LGBTIQ+ children and youth.
- The ways that children and youth can engage in self-advocacy; and
- The needs of differently abled children and youth.

When these are ready for the Episcopal Diocese of Montana they will be added to the curriculum.

Certification of training shall be renewed **every four years**.

Dioceses, congregations, and other organizations with responsibility for programs with services or ministries to children and youth shall keep records sufficient to evidence compliance with this policy.

VI. Monitoring and Supervision of Programs

A Responsible Person shall monitor and supervise the behavior of adults, children, and youth to ensure appropriate behavior and healthy boundaries.

All people who minister to children and youth must have ongoing supervision. Ongoing supervision should consist of regular check-ins by the Supervisor who may be parish clergy or a team leader. Such supervision shall review the scope, accountability, and responsibly of the ministry with the person engaged in the ministry. Each person engaged in such ministry should know who supervises their ministry and how to always reach them.

Dioceses, congregations, and organizations shall ensure that all people who minister to children and youth receive prior training as to the scope, accountability, and responsibility of the ministry.

Dioceses, congregations, and organizations shall maintain an up-to-date list of persons with their contact information approved to minister to children and youth. This list shall be kept in the organization's office or other place where records are kept.

A. Unrelated Adults Required

There shall be at least two unrelated adults (one of whom must be older than 25 years, and the other must be at least two years older than the eldest participant) present at all parish ministry settings and events designed for children and youth.

At Camp, two Counselors (one of whom must be 18 years or older and the other at least two years older than the eldest participant) must be present in the cabins during sleeping hours.

f unanticipated circumstances result in an adult being alone with children or youth, that adult shall report those circumstances to the Supervisor, clergy in charge, senior warden, or Responsible Person as soon as possible.

Only one adult may be sufficient in well-monitored, visually accessible program space on the church or camp grounds, such as a Sunday School classroom, provided that another adult can maintain visual contact with the adult program leader. This can be accomplished by designating an individual to conduct frequent random checks of classrooms and unlocked spaces throughout the building(s). These exceptional circumstances must be specifically described in a written document and approved by the governing body of the congregation. See also sections on **Overnight Programs** (Section 2.VI.I) and **Transportation** (Section 2.VI. J).

B. Creating Safe Space for Children and Youth

To create a safe space, it is necessary to anticipate and avoid circumstances in which children and youth are exposed to inappropriate consumables, materials, unmonitored adult contact, or unsupervised peer contact.

For example:

- **Alcoholic beverages**. Alcohol (sacramental or otherwise) shall not be stored in publicly accessible areas of the church buildings.
- **Computers and electronic devices**. Children and youth shall have adequate supervision when using electronic devices belonging to dioceses, congregations, and other organizations. Devices shall have adequate password protection. Each user shall have their own account and password. See *Recommended Practices and Guidelines for Social Media and Electronic Communications* (Appendix B).
- Documentation on key-holders (or electronic door codes) should be kept in a list and accessible to the parish.
- **Unused spaces**. Spaces not in use should not be readily accessible. Given the vast differences in facilities, each diocese, congregation, and other organization should determine how best to meet this standard.

C. One-to-One Conversations with Children or Youth

When one-to-one conversations occur between an adult and a child or youth, another unrelated adult is either to be present or capable of visually monitoring the conversation.

Examples include:

- Planned or unplanned on-site conversations can take place in a public location, away from where others can hear but in view of other adults.
- Planned off-site conversations/meetings can take place in a public place (such as a coffee shop or restaurant) in view of other adults. A Responsible Person shall be informed about the appointment or plans in advance.

Confidentiality cannot be guaranteed if a child or youth discloses a situation pertaining to abuse, neglect, self-harm, or exploitation because of mandatory reporting laws.

Impulsive, secluded, or secretive activity, online or in person with children or youth, may foster a high-risk situation, and is therefore to be avoided. See *Recommended Practices and Guidelines for Social Media and Electronic Communications* (Appendix B).

D. Basic Needs

No one is to be deprived of the basic human needs of food, drinking water, shelter, sleep, access to restrooms, safety, and clothing at any event.

Exceptions may be made for programs intended to instruct children or youth about poverty, need, and hunger, such as an intentional fasting program. In these cases, children and youth must agree to participate in writing, and parents or guardians must give written permission that includes certification that the youth or child does not have a medical condition that would put the participant at risk by fasting or missing sleep. Participants who wish to withdraw or who are unable to complete the program must have their basic needs met immediately.

E. Inclusiveness

No one shall be denied rights, status, or access to an equal place in the life, worship, and governance of any program or activity because of race, color, ethnic origin, national origin, marital status, sex, sexual

orientation, gender identity and expression, differing abilities, or socio-economic class. To the extent possible, all spaces and settings for programs, activities, and ministry shall be accessible.

The Episcopal Church seeks to support all children and youth by providing reasonable alternative arrangements regardless of state law to address safety and comfort.

Transgender or gender non-binary children or youth who express the need or desire for increased privacy should be provided with reasonable alternative arrangements. Reasonable alternative arrangements may include the use of a private area, or a separate changing schedule, or use of a single stall restroom. Any alternative arrangement should be provided in a way that protects the child or youth's ability to keep their transgender status confidential. They should not be required to use a locker room or restroom that conflicts with their gender identity. Safe bathroom/shower facilities will be provided by gender (or specific times will be assigned to the use of a single facility).

Adults should either have separate shower facilities or shower at other times than the youth. Separate dressing facilities should also be provided. See section on **Overnight Programs** (Section 2.VI.I).

F. Violence and Weapons

- No one is to strike, hit, or otherwise physically threaten or harm anyone at any time.
- Bullying of any kind by anyone is prohibited.
- Children and youth shall not have weapons of any kind at any event or program for children or youth. Exceptions to this restriction may be made for camp programs or other specific programs with prior approval.
- Report suspected violations immediately. See Suspected Violations of this Policy (Section 2.VII.B).

G. Behavioral Standards for Adults in Ministry with Children or Youth

Adults who work with children and youth are expected to model the patterns of healthy relationships that children and youth deserve in all settings. Interactions should meet all requirements outlined above, and adults shall be discouraged from initiating a private relationship with any unrelated child or youth from the church away from sanctioned church activities.

DOs—Adults are encouraged to:

- Have ongoing spiritual practices, which might include daily prayer, regular participation in corporate worship, and Bible study.
- Spend time with and listen to children and youth, and advocate for their ministry within the Body of Christ.
- Offer appropriate physical expressions of care, which may include:
    - high fives and fist bumps.
    - handholding while walking with small children or in prayer.
    - brief touching of shoulders, hands, or arms.
    - "Laying on of hands" under appropriate pastoral supervision.
    - brief hugs and arms around shoulders; and
- Model appropriate affection with other adults and be accountable to the community for behavior.

DON'Ts—Adults shall not under any circumstances:

- Provide children or youth with non-sacramental alcohol, marijuana, drugs, cigarettes, tobacco products, e-cigarettes, vapes, or pornography.

- Arrive under the influence of alcohol, illegal drugs, or misused legal drugs at any children's or youth event or when they are responsible for children or youth at an event.
- Consume non-sacramental alcohol or illegal drugs or misuse legal drugs at any children's or youth event or when they are responsible for children or youth at an event.
- Engage in illegal behavior or permit other adults or children or youth to engage in illegal behavior.
- Engage in any sexual, romantic, illicit, or secretive relationship or conduct with any child or youth; or
- Apart from planned pre-approved educational programs, discuss their own sexual activities, fantasies, or their own use, or abuse of drugs or alcohol with children or youth.

Anyone who suspects a violation of these policies shall take steps as outlined in "Responding to Concerns" (Section 2.VII).

H. Special Considerations for Off-Site Programming

Off-site programs, trips, and events are a welcome and often necessary means for spiritual, social, and emotional development of children and youth. They also present additional challenges for maintaining best practices for safe and healthy ministry. The expectations for safe space, as described above, should be observed off-site.

In the event of uncertainty about application of the policy, the Responsible Person should contact their supervisor with the relevant queries.

Because of the unique risks that cannot always be anticipated, it is important to obtain permissions and manage documentation as described below.

1. **Prior Approvals**
   - Prior approval by the governing body and the member of the clergy in charge is required, and that approval shall be reflected in the minutes of the governing body. Diocesan sponsored programs, trips, or events shall receive prior diocesan approval.
   - Written parental approval is required prior to viewing any movie, whether off- site or on-site, rated "PG-13" or above, or participating in any conversation or program containing sexually explicit or violent content.
   - These same prior approvals are required when the site is a private residence, hosting such events as cook outs, pool parties, progressive dinners, etc.

2. **Registration, Waiver, and Release Forms**
   - All children, youth, and adults shall complete and sign a registration form and a waiver and release form before participating in any programs. Confidentiality must be preserved with respect to medical and other sensitive information in the forms.
   - There must be a parent/guardian's signature on all release and waiver forms for minors. Digital/electronic signatures are acceptable in the State of Montana.
   - Completed release and waiver forms shall be maintained in a secure location on-site or online. Please check with your bishop's office concerning whether such forms may be saved electronically and the length of time the forms must be saved.
   - Permission slips shall be provided for each off-site event and shall be signed by the parent/guardian.
   - Prior permission for a minor to be photographed or recorded on film, videotape, audiotape, or other electronic media is required from a parent/guardian.

3. **First Aid and Medications**
    - Current certification in First Aid, CPR, and Automated External Defibrillator (AED) is strongly encouraged for those who work with children and youth.
    - A first aid kit, appropriately stocked for the event and participants, shall be available in an easily accessible location.
    - A record must be kept for all medication, or first aid given to a participant. This record shall include the participant's name, the date and time of service, the name of the person administering medication or treatment, and a description of the medication, dosage, and/or treatment given.
    - All medications (prescription and over the counter) belonging to minors shall be given to the Responsible Person, unless otherwise agreed upon by the parents and the Responsible Person. Exceptions may include inhalers, epi-pens, and birth-control pills.
    - Only the Responsible Person, or their adult designee, shall administer medications.

4. **Supervision**
    - At any gathering of children or youth, there shall be at least two unrelated adults with one being age 25 or older, preferably reflecting the sex and gender identity of the participants.
    - Minimum ratios of adult to child/youth shall be in accordance with American Camp Association (ACA) guidelines as follows:
        - 5 years & younger — 1 adult for each 5 overnight-participants and 1 adult for each 6 day-participants
        - 6–8 years — 1:6 for overnight, and 1:8 for day
        - 9–14 years — 1:8 for overnight and 1:10 for day
        - 15–18 years — 1:10 for overnight and 1:12 for day
    - Additional adults can provide skills, mentorship, support, encouragement, spiritual guidance, and joy.
    - When you have new leaders-in-training, the leadership teams should also have a reasonable number of experienced adult leaders to provide support.

5. **Insurance**

    All trips to off-site destinations must have adequate insurance in case of emergency. For more information contact your insurance broker. For events organized by the diocese, contact the diocesan office.

I. Overnight Programs

In overnight programing, particular attention will be given to historically excluded or unrecognized people, such as LGBTQ+ and differently abled individuals. In a situation of unequal power and safety, preferences of these individuals merit additional consideration, accommodation, and action to ensure:

- Participant privacy.
- Maximization of social integration of all participants.
- Minimization of stigmatization of any participants.
- Equal opportunity to participate; and
- Safety of all participants.

Other guidelines for overnight programs:

- The safe use of restrooms and showers by all participants requires dioceses, congregations, and other organizations to consider numerous factors, including, but not

limited to age, sex, gender identity and expression, and privacy. Adults should have separate showers or separate times for showers.

- Overnight programs shall provide safe, supervised sleeping arrangements.
    - No bed, cot, or sleeping bag shall have more than one person sleeping in it.
    - Supervision by two unrelated adults is required in any space where one or more youth are sleeping.
    - It is acceptable for all participants to sleep in the same open area when dressing rooms and bathrooms provide appropriate privacy.
- Participants shall have access to three substantial meals each full day and access to sufficient water.
- Participants shall be given the opportunity for at least seven hours of sleep each 24-hour period, except for programs where parental/guardian permission is given to miss sleep. In these cases, children and youth must agree to participate in writing, and parents or guardians must give written permission that includes certification that the youth or child does not have a medical condition that would put the participant at risk by missing sleep.
- Participants shall have some time set aside each day for rest or free time.

Best practice guidelines for hotel stays:

- One child or youth per bed, including cots, pullouts or hideabeds, and rollaway beds.
- At least 2 children or 2 youth in each room.
- Adult supervisors or chaperones have rooms on the same floor, scattered among the rooms with children or youth, and at least one adult room is by the stairs or elevators.
- Adult leader assigns rooms and room occupants.

J. Transportation

- For the health and safety of all participants, the following practices shall be followed: For events that originate and/or terminate at the diocesan, congregation, or organization's facility, all drivers must be at least 21 years of age and provide proof of insurance and a current driver's license, a completed volunteer driver information form, and have a DMV records check deemed to be satisfactory.
- All drivers and riders must comply with state laws including seat belt and cell phone usage.
- Parents/guardians are responsible for the transportation and safety of their children and/or youth to and from the event. This responsibility includes the transportation of any other passengers in their vehicle.

K. Camps and Retreat Centers

All camps, camping programs, and retreat centers of the diocese shall follow the guidelines for off-site programming established in this policy. In addition, camps should aim to follow American Camp Association standards to the best of the camp's ability.

L. Travel

Travel with children and youth presents amazing opportunities for participants to experience the church and the world on a larger scale with vastly different perspectives of faith communities and their contexts. It also presents challenges to normal safety protocols and opportunities for creativity if managed well. The following policies will help groups prepare for a variety of potential scenarios, as well as for domestic and international travel.

1. Adult Leaders and Chaperones

- Minimum ratios of adult to youth need to be greater due to the possibility of leaving an adult behind with a participant in the event of a medical emergency.
    - 5 and younger – 1:5
    - 6 – 8 years – 1:6
    - 9–14 years — 1:8
    - 15–18 years — 1:10
- Regardless of group size, no group should travel with fewer than three adult chaperones.
- One adult, minimum age 25, should serve as the travel administrator who is responsible for all aspects of the trip, including carrying all necessary documentation, contacts, and forms including:
    - medical releases.
    - community covenant.
    - emergency contacts.
    - itineraries; and
    - cash and/or credit card capacity to address emergencies.
- It is a best practice that, one adult, minimum age 25, should hold a current medical certification to manage administration of necessary and permissible medications, administer immediate and necessary first aid, and triage medical situations to determine if care of an individual needs to be taken to a higher level of care. When this is not possible, one person should be designated to supervise the administration of medications as instructed on medical release forms, and a clinic near your destination should be identified ahead of time in order to respond to health emergencies as rapidly as possible.
- Acceptable medical certifications include:
    - Wilderness Medical Response
    - Outdoor Emergency Care
    - Emergency Medical Technician/Paramedic
    - Nurse — RN/LPN/Nurse Practitioner
    - Physician's Associate
    - Medical Doctor
- Best practice is to designate an adult to serve as back-up to the travel administrator, and as back-up for simple first aid and administration of prescriptions. These could be the same person.
- A copy of all documents should be left with an accountable person at the diocesan, congregation, or organization's office. That person should also serve as the local emergency contact person for communications between the traveling group and families at home.

2. Insurance for Travel

- Short-term trip or supplemental insurance, available through most church and organization's policies as an added rider, must be secured at least one month prior to travel.
- It is recommended that all travelers carry evidence of personal health insurance by virtue of a copy of the actual card provided to the insured person.
- Because not all individuals have access to affordable and adequate health insurance, it is recommended that health insurance be added to trip insurance.

3. International Considerations

- Check in with the U.S. Department of State on travel requirements, including visas.
- Make certain that every traveler's passport is valid for at least six months beyond your return date.

- Determine whether or not vaccinations are required and/or recommended for entry into specific countries.
- Arrange to have at least two cell phones with the group that will have active coverage in your destination(s). Make a back-up plan for communication with your Responsible Person at home.
- A more thorough list of international travel considerations with links to U.S. and global organizations can be found in the Youth in Mission Manual here: http://www.episcopalchurch.org/files/7-traveling_7.pdf

VIII. Responding to Concerns

In cases where criminal activity is suspected, local law enforcement should be contacted first.

A. Suspected Abuse, Neglect, or Exploitation of Children and Youth

Any adult who has reason to suspect that abuse, neglect, or exploitation of children or youth has taken place, is required, and all mandated reporters are required to contact the state's Child Protective Services.

In addition, anyone who has reason to suspect that abuse, neglect, or exploitation of children or youth has taken place within a facility or program of the diocese, congregation, or other organization, should immediately inform one of more or the following:

- The bishop or the bishop's office in the case of a diocese.
- Member of the clergy in charge or the senior warden in the case of a congregation.
- The director, head, or other governing officer in the case of other organizations; and/or
- The Intake Officer in case a member of the clergy is suspected of abuse, neglect and/or exploitation.

B. Suspected Violations of this Policy

Anyone who suspects a violation of these policies shall immediately report the violation to the Responsible Person, member of the clergy in charge, and senior warden.

Clergy in charge receiving reports of violations of this policy shall be responsible for providing appropriate pastoral care to all those affected and appropriate remedial and/or disciplinary action up to and including termination of employment or unpaid ministry with the church. If the Responsible Person is a lay person, they are responsible to ensure that appropriate pastoral care is provided for all.

Anyone who suspects a violation of these policies by a member of the clergy shall immediately report the violation to the bishop's office and/or the Intake Officer. Anyone can make a report to an Intake Officer.

The bishop, hearing reports of violations by clergy, or by laity at diocesan events, shall be responsible for providing appropriate pastoral care to all those affected and appropriate remedial and/ or disciplinary action, up to and including canonical disciplinary action, as provided by Title IV of the Constitutions and Canons and/or termination of employment or unpaid ministry with the diocese.

C. Local Resources for Response

Each diocese, congregation, or organization shall provide a list of local resources that can give information and assistance to anyone concerned about circumstances that may violate this policy. Such resources with contact information shall include:

- Responsible Person(s) for programs and ministries with children and youth.

- Clergy in charge of a congregation.
- Wardens.
- Bishop.
- Intake Officer(s); and
- Child Protective Services.

VIII. Policy Adoption, Implementation, and Audit

A. The Episcopal Church Adoption and Implementation

The Episcopal Church shall ensure that all programs and events of the Episcopal Church involving vulnerable persons comply with the standards set out in this policy.

B. Diocesan Adoption, Implementation, and Audit

This policy was adopted by the Episcopal Diocese of Montana through Commission on Ministry on February 18, 2025, and Diocesan Council on February 22, 2025.

The bishop or ecclesiastical authority shall inform congregations and other organizations within the diocese of the contents of this policy with the requirement that each congregation or organization adopt a policy in accordance with this policy.

This policy should be reviewed before June in even-numbered years, by the Commission on Ministry to ensure that it is up to date and adequately reflects the best interests of the people of the Diocese and the safety of all of God's children. In cases of extensive revision, a special task force may be called by the bishop or ecclesiastical authority.

Procedures to be confirmed by audit will include (but are not limited to):

1. Existence of diocesan policy that is consistent with and/or exceeds the requirements of this policy.
2. Provision of accessible and appropriate training for all those who work with vulnerable people in accordance with *Safe Church Training Requirements and Recommendations* (Appendix A). Such training shall include, at a minimum, topics identified in this policy.
3. Verification that each congregation and/or organization (including Camp Marshall) within the diocese has adopted a policy that is consistent with and/or exceeds the diocesan policy; and
4. Verification that each congregation and/or organization (including Camp Marshall) has a process to ensure members access training and conduct public record checks; and
5. Review of this policy with possible suggestions for modifications to the Commission on Ministry.

C. Congregation and Organization Adoption, Implementation, and Audit

Congregations and organizations must adopt a **Policy for the Protection of God's People** that is consistent with and/or exceeds the requirements in this policy.

Congregations and organizations may adopt site-specific variations from diocesan policies, where permitted by vestries or governing bodies, which shall be described in detail, including the circumstances under which those variations are to be permitted and their rationale. This approval shall be recorded in the minutes of the vestry or governing body.

The **Policy for the Protection of God's People** shall be posted in an area where activities take place, and shall be given to all adults, guardians, and all paid and unpaid persons who minister to vulnerable persons. These policies shall include the names and phone numbers of the member of the clergy in charge, the senior warden, and a contact person in the bishop's office.

Each congregation or organization is required to conduct a **Safe Church Self-Audit** annually to confirm compliance with diocesan safe church policies. This Self-Audit will be overseen by the Rector and Vestry and reported to the Diocesan office. Individual congregations/organizations may contact the Diocese at safeguarding@diomontana.com to verify ministers' status.

Procedures to be confirmed by audit will include (but are not limited to):

1. Public records checks, application forms, records of screening, and reference verification of paid and unpaid persons engaged in ministry with adults as agents of the church.
2. Records of compliance with ***Safe Church Training Requirements and Recommendations*** (Appendix A);
3. Procedures for responding to concerns and incidents; and
4. Evidence of compliance with "safe space" requirements.

Appendix A: Safe Church Training Requirements and Recommendations

This list is also available on the "Safe Church" page of Diocesan Website.

https://diomontana.com/portfolio-item/safe-church/

For further reference, please see the current Lay Ministry Manual

https://diomontana.com/publication/lay-ministry-manual-2/

These requirements are effective as of January 1, 2025. If you were licensed prior to this date, your certification(s)/licensure stands valid until its original expiration date.

Newly ordained Clergy

The following modules and an initial 10-year background check is required.

1. Know Your Policies—Diocese of Montana
2. Safe Church, Safe Communities—Universal Training: Intro & Theological Background
3. Safe Church, Safe Communities—Universal Training: Organizational Rules & Policies
4. Safe Church, Safe Communities—Universal Training: Healthy Boundaries
5. Safe Church, Safe Communities—Universal Training: Inclusion
6. Safe Church, Safe Communities—Specialty Training: Pastoral Relationships
7. Safe Church, Safe Communities—Specialty Training: Power & Relationships
8. Safe Church, Safe Communities—Specialty Training: Abuse & Neglect
9. Keeping Your Church Safe
10. Social Media Safety

Clergy new to the Diocese of Montana

The following modules and an initial 10-year background check is required.

1. Know Your Policies—Diocese of Montana
2. Safe Church, Safe Communities—Universal Training: Intro & Theological Background
3. Safe Church, Safe Communities—Universal Training: Organizational Rules & Policies
4. Safe Church, Safe Communities—Universal Training: Inclusion
5. Safe Church, Safe Communities—Specialty Training: Pastoral Relationships
6. Safe Church, Safe Communities—Specialty Training: Power & Relationships
7. Safe Church, Safe Communities—Specialty Training: Abuse & Neglect
8. Social Media Safety
9. Duty to Report: Mandated Reporter

Clergy Renewal

The following modules must be completed, and a public records check is required every four years.

1. Know Your Policies—Diocese of Montana
2. Duty to Report—Mandated Reporter
3. Safe Church, Safe Communities—Specialty Training: Power & Relationships

Recommended:

- Safe Church, Safe Communities—Specialty Training: Abuse & Neglect
- Social Media Safety

New licensed Lay Eucharistic Visitor

The following modules are required before being licensed:

1. Know Your Policies—Diocese of Montana
2. Safe Church, Safe Communities—Universal Training: Intro & Theological Background
3. Safe Church, Safe Communities—Universal Training: Healthy Boundaries
4. Safe Church, Safe Communities—Specialty Training: Abuse & Neglect
5. Safe Church, Safe Communities—Specialty Training: Pastoral Relationships

A public records check is highly recommended for LEVs, however, as the nature of this ministry is to be done in teams of two, it is not mandatory. Also recommended are the following modules:

- Safe Church, Safe Communities—Universal Training: Inclusion
- Keeping Your Church Safe

Licensed Lay Eucharistic Visitor Renewal

Required:

1. Know Your Policies—Diocese of Montana
2. Safe Church, Safe Communities—Specialty Training: Pastoral Relationships
3. Safe Church, Safe Communities—Specialty Training: Abuse & Neglect
4. Safe Church, Safe Communities—Specialty Training: Power & Relationships

New licensee (including: Pastoral Leader, Worship Leader, Catechist, Evangelist, Lay Preacher, Lay Eucharistic Minister)

Required:

1. Know Your Policies—Diocese of Montana
2. Safe Church, Safe Communities—Universal Training: Intro & Theological Background
3. Safe Church, Safe Communities—Universal Training: Healthy Boundaries

Recommended:

- Safe Church, Safe Communities—Universal Training: Inclusion
- Keeping Your Church Safe

Licensed Minister (including: Pastoral Leader, Worship Leader, Catechist, Evangelist, Lay Preacher, Lay Eucharistic Minister) Renewal

Required:

1. Know Your Policies—Diocese of Montana
2. Safe Church, Safe Communities—Specialty Training: Power & Relationships

New Vestry Members

Required:

1. Know Your Policies—Diocese of Montana
2. Safe Church, Safe Communities—Universal Training: Intro & Theological Background
3. Safe Church, Safe Communities—Universal Training: Inclusion

Recommended:

- Safe Church, Safe Communities—Universal Training: Healthy Boundaries
- Keeping Your Church Safe

Vestry Members, Renewal

As Vestry terms are three years, there is minimal need for "renewal."
Only re-elected vestry members need to complete the above Safe Church requirements.

New Youth Workers

A public records check is required for all youth workers, in addition to the following courses:

1. Know Your Policies—Diocese of Montana
2. Safe Church, Safe Communities—Universal Training: Intro & Theological Background
3. Safe Church, Safe Communities—Universal Training: Healthy Boundaries
4. Safe Church, Safe Communities—Universal Training: Inclusion
5. Social Media Safety

Recommended:

- Safe Church, Safe Communities—Specialty Training: Abuse & Neglect
- Safe Church, Safe Communities—Specialty Training: Power & Relationships
- Safe Church, Safe Communities—Specialty Training: Bullying
- Keeping your Day/Overnight Camp Safe (context specific)

Youth Workers Renewal

A public records check is required every four years for all youth workers, in addition to the following renewal course:

1. Know Your Policies—Diocese of Montana
2. Safe Church, Safe Communities—Universal Training: Inclusion
3. Safe Church, Safe Communities—Specialty Training: Power & Relationships
4. Duty to Report: Mandated Reporter

Recommended:

- Keeping Your Church Safe
- Keeping Your Day/Overnight Camp Safe (context specific)

Church Staff (if not covered elsewhere)

Required:

1. Know Your Policies—Diocese of Montana
2. Safe Church, Safe Communities—Universal Training: Intro & Theological Background
3. Safe Church, Safe Communities—Universal Training: Organizational Rules & Policies
4. Safe Church, Safe Communities—Universal Training: Healthy Boundaries

5. Safe Church, Safe Communities—Universal Training: Inclusion

Youth Assistant Volunteers (<18 years of age, if 18+ refer to "Youth Worker")

Required:

1. Know Your Policies—Diocese of Montana
2. Safe Church, Safe Communities—Universal Training: Intro & Theological Background
3. Safe Church, Safe Communities—Universal Training: Healthy Boundaries

General Congregation Members

In order to foster a more healthy and safe church community, we encourage all members of the Diocese to consider the taking the following courses for continuing education.

Recommended:

- Know Your Policies—Diocese of Montana
- Safe Church, Safe Communities—Universal Training: Intro & Theological Background
- Safe Church, Safe Communities—Universal Training: Healthy Boundaries
- Safe Church, Safe Communities—Universal Training: Inclusion
- Safe Church, Safe Communities—Specialty Training: Power & Relationships

Appendix B: Recommended Practices and Guidelines for Social Media and Electronic Communications for Adults

Social media is an ever-increasing part of adult lives and has the potential to empower ministry. Behavior in the digital sphere is never private. Posted content may be used out of context and out of the control of the originating individuals and organizations, putting them at risk. In addition, these powerfully connective tools are subject to the same dynamic of unequal power and potential for abuse that present a risk in all ministry relationships. Churches face the challenge of identifying and proactively addressing areas of potential risk in social media use amid rapidly evolving technology. The following recommended practices and guidelines are designed to be a flexible template for developing policies and covenants governing the safe use of social media and digital communication in ministry settings.

General Information about Digital Communications

1. All communications sent digitally (email, social networking sites or platforms, notes, texts, or posts, etc.) are NOT CONFIDENTIAL and can be shared or reposted to others.
2. Interactions in the virtual world need to be transparent; that is, occurring in such a way that it is easy for others to see what actions are performed.
3. In the virtual world, healthy boundaries and safe church practices must be adhered to as they are in the physical world.
4. In the virtual world, "friend" can mean anyone with whom you are willing to communicate through that medium. In the physical world, friend can mean much more in terms of intimacy, self-disclosure, mutuality, and expectations for relationship.
5. Laws regarding mandated reporting of suspected abuse, neglect, or exploitation of vulnerable adults apply in the virtual world as they do in the physical world. Check your local applicable laws.

Recommended Practices and Guidelines for Churches and Organizations:

1. Establish a policy that outlines professional and institutional standards for profiles and interactions on social networking sites and platforms.
2. Establish a policy of transparency regarding social media accounts. The best practice is to have the diocese, congregation, or organization create and "own" the social media accounts representing the diocese, congregation, or organization respectively and have multiple administrators and/or supervisors with access. If personal accounts are used, a system of monitoring should be established.
3. Establish a policy regarding the identification or "tagging" of individuals in online photos. For example, on Facebook, "tagging" someone in a photo or video creates a hyperlink to that person's profile page that can be clicked by anyone. The best practice is for the diocese, congregation, or organization not to identify or "tag" individuals. The "tagging" of vulnerable adults should be discouraged. The captioning of photos or videos may be permitted when written permission is provided by a vulnerable adult (or the person's guardian, spouse, or other trusted family member when the vulnerable adult is unable to consent due to impairment or

lack of agency). The caption should not include the individual's full name, nor should it create a clickable link to someone's personal profile.

4. A diocese, congregation, or organization does not have a responsibility to review or monitor the personal pages or groups that are not sponsored by that diocese, congregation, or organization, except as described above. The preceding statement should be included in the diocese, congregation, or organization's Social Media Policy.
5. Email can be a good method of communication, and it also could be misunderstood. Having a clear understanding and procedure when responding to digital communication that raises concern is prudent for all. Best practices can include not responding immediately and sharing the communication with a supervisor before responding. Phone and face-to-face meetings are preferred when responding to emotionally driven communications or pastoral emergencies.
6. When using photos and videos for ministry purposes, obtain a media release for each person and only post images that respect the dignity of every person depicted.
7. Dioceses, congregations, or organizations must inform participants when they are being videoed because church buildings are not considered public space. Signs should be posted that indicate a service or activity will be broadcast when worship services or activities are streamed or distributed on the web or via other broadcast media.

Recommended Practices and Guidelines for Adults:

1. Prudent judgement should be used in the time of day an adult is contacted through social media. Under normal circumstances, refrain from contact or exchanging texts, chats, or emails before 8:00 am or after 8:00 pm, unless it's an emergency.
2. Privacy settings and personal boundaries should be implemented.
    a. Create and use profiles on social networking sites that meet professional and institutional standards.
    b. Apply privacy settings that are consistent with all adults, across all social networking sites and platforms. Avoid playing favorites or the appearance of playing favorites.
    c. Establish a regular ongoing and consistent system of review that focuses on settings, accessible content, photos, and videos to ensure compliance with professional and institutional standards.
    d. When possible, send communication (1) to entire groups, (2) on an individual's "wall," or (3) in public areas, rather than in private messages. This includes photos, images, and videos.
    e. Disclose **ongoing** digital pastoral communications (i.e., e-mails, Facebook messages, texting, etc.) with an adult to a supervisor to determine when a referral to a professional provider or resource is needed.
3. Create covenants to govern digital groups, which include:
    a. Appropriate and inappropriate behavior of members (bullying, pictures that depict abuse, violence, illegal activities, sexual acts, etc.) and the consequence for inappropriate behavior.

b. Who may join and/or view group activity, when participants should leave the group, and when/if the group will be disbanded.
c. Description of content that can be posted or published on the site or page.
d. Discourage "tagging" photos and videos of adults. However, the captioning of photos and videos is permissible with appropriate written permission as described above.
e. Notification that mandatory reporting laws will be followed; and
f. Consequences for breaking the covenant.

4. Delete inappropriate material posted in digital groups, address the behavior and report, if necessary, in accordance with legal and institutional requirements.
5. In video calls, follow the same criteria used in telephone calls. In addition, prudent judgement regarding attire and surroundings should be observed.
6. Comply with the following best practices regarding "groups" on social networking sites:
    a. Have at least two unrelated administrators.
    b. Use closed groups, but not "hidden" or "secret" groups, for adults.
    c. Remove any content that shows or describes inappropriate behavior outside the bounds of the established behavioral covenant; and
    d. Observe mandated reporting laws regarding suspected abuse, neglect, and exploitation.